

Our File No. TAR-278-CM
ATTORNEY ID - 050371991
FISHMAN MCINTYRE LEVINE SAMANSKY, P.C.
120 Eagle Rock Avenue
East Hanover, New Jersey 07936
Tel: (973) 560-9000
Attorneys for Defendant, Target Corporation i/p/a Target

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SAMANTHA INZINNA	:	
	:	
Plaintiff,	:	
	:	
-vs-	:	CIVIL ACTION NO.
	:	
TARGET and/or ABC CORPS 1-6 and/or	:	
JOHN DOES 1-6 (fictitious names)	:	
	:	
Defendants	:	
	:	

PETITION FOR REMOVAL

Petitioner, Target Corporation i/p/a Target, by its attorneys, Fishman McIntyre Levine Samansky, P.C., respectfully petitions the United States District Court for the District of New Jersey as follows:

1. Based on information and belief, Target Corporation first received a copy of the Complaint on or about June 7, 2022 through their registered agent.
2. This case was commenced on June 1, 2022 in the Superior Court of New Jersey, Law Division, Middlesex County Suit is identified in the Superior Court as Inzinna, Samantha v. Target, Docket No. L-2648-22. (See Exhibit A)
3. The filing of this Petition for Removal is timely because it is filed within thirty days of the date Target Corporation first received notice of the lawsuit.
4. The plaintiff's Complaint in the Superior Court of New Jersey, Law Division,

Middlesex County, asserts damages of a non-specified amount. Plaintiff, Samantha Inzinna, alleges she slipped and fell on water causing her to sustain severe physical, mental and permanent injury and other diverse damages. As such, Target Corporation, believes the amount in controversy exceeds \$75,000, exclusive of interest and costs.

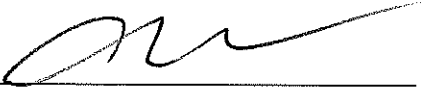
5. Target Corporation is informed and believes that Plaintiff, Samantha Inzinna, is an individual citizen of the State of New Jersey. Defendant/petitioner, Target Corporation is incorporated in the State of Minnesota and its principal place of business is in the State of Minnesota. The action is therefore between citizens and a corporation of other states.

6. Accordingly, this action is removable to this Court pursuant to 28 U.S.C. § 1441.

WHEREFORE, Petitioner, Target Corporation, defendants in the action described herein, which is currently pending in the Superior Court of the State of New Jersey, Law Division, Middlesex County, Docket No. L-2648-22, prays that this action be removed therefrom to this Court.

DATED: June 27, 2022

Target Corporation i/p/a Target

BY: 
Christopher E. McIntyre, Esq.

I certify that a true copy of the Complaint filed in the Superior Court of the State of New Jersey, County of Middlesex, along with a copy of the Summons issued to this defendant, is annexed hereto as Exhibit A.


BY: 
Christopher E. McIntyre, Esq.

EXHIBIT A

THE LAW OFFICE OF JAMES M. CURRAN
NEW JERSEY BAR ID REGISTRATION #028631984
86 Washington Avenue
Milltown, New Jersey 08850
(732) 296-0500
Attorney for Plaintiff

SAMANTHA INZINNA,	:	SUPERIOR COURT OF NEW JERSEY
	:	MIDDLESEX COUNTY
Plaintiff,	:	LAW DIVISION
vs.	:	DOCKET NO.
TARGET and/or ABC CORPS.	:	CIVIL ACTION
#1 to #6 (fictitious	:	
names) and/or JOHN DOES	:	COMPLAINT & JURY DEMAND
#1 to #6 (fictitious	:	
names),	:	
Defendants.	:	

Plaintiff, SAMANTHA INZINNA residing at 114 Holly Street,
Port Reading, in the Township of Woodbridge, County of Middlesex
and State of New Jersey, complaining against the defendants
herein says:

FIRST COUNT

1. On or about June 22, 2020, plaintiff, SAMANTHA INZINNA
was a lawful business invitee on the premises known as TARGET
located at 100 Parsonage Road, in the Township of Edison, County
of Middlesex and State of New Jersey.

2. At the time and place aforesaid, defendants TARGET, and/or ABC CORPS. #1 to 3 and/or JOHN DOES #1 to #3 (fictitious names) individually, jointly, and/or severally by and through their agents, servants and/or employees did own, control, supervise, lease and/or maintain the premises aforesaid.

3. The defendants TARGET, and/or ABC CORPS. #1 to 3 and/or JOHN DOES #1 to #3 (fictitious names) were negligent in the supervision, maintenance and control of said premises.

4. As a direct and proximate consequence of the joint and several negligence of the defendants enumerated herein, SAMANTHA INZINNA was injured when she slipped and fell on water causing her to sustain severe physical, mental and permanent injury and other diverse damages.

WHEREFORE, plaintiff demands judgment against defendant, TARGET and/or ABC CORPS. #1 to 3 and/or JOHN DOES #1 to #3 (fictitious names) jointly, severally or in the alternative for damages and costs of suit.

SECOND COUNT

1. Plaintiff repeats and reiterates each of the allegations as set forth in Count One as if same were set forth herein at length.

2. At the time and place aforesaid, defendants JOHN DOES #4 TO #6 (fictitious names) and/or ABC CORPS. #4 to #6 (fictitious names) did negligently create a hazard over which

they had actual and/or constructive notice by spilling or leaving water on the floor in the store and/or failing to remove the water from the floor on the aforesaid premises in the course of doing business at the aforementioned TARGET located at 100 Parsonage Road, in the Township of Edison, County of Middlesex, and State of New Jersey, causing plaintiff to sustain various injuries.

3. The defendants aforesaid are charged with the duty to exercise the highest possible care to protect plaintiff, SAMANTHA INZINNA, from dangers that are known or are reasonably foreseeable including but not limited to general negligence.

4. The negligent conduct of defendants in failing to exercise the required high degree of care causing the plaintiff to be injured, have caused her to incur and in the future incur expenses for the treatment of said injuries, and will cause her great pain and suffering in the future to her great loss and damage.

WHEREFORE, plaintiff, SAMANTHA INZINNA, demands judgment against defendants, JOHN DOES #4 to #6 (fictitious names) and/or ABC CORPS. #4 to #6 (fictitious names) individually, jointly, severally or in the alternative for damages and costs of suit.

JURY DEMAND

Plaintiff hereby demands a trial by jury as to all issues herein.

CERTIFICATION PER R. 4:5-1

I hereby certify, R.1:4-4(b) that the matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding and none are contemplated.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false I am subject to punishment.

DESIGNATION OF TRIAL COUNSEL PURSUANT TO RULE 4:25-4

James M. Curran, Esquire, attorney for the aforementioned plaintiff, is hereby designated as trial counsel in the within matter.

A handwritten signature in dark ink, appearing to read 'James M. Curran', is written over a horizontal line.

JAMES M. CURRAN

DATED: June 1, 2022

MIDDLESEX VICINAGE CIVIL DIVISION
P O BOX 2633
56 PATERSON STREET
NEW BRUNSWICK NJ 08903-2633

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (732) 645-4300
COURT HOURS 8:30 AM - 4:30 PM

DATE: JUNE 01, 2022
RE: INZINNA SAMANTHA VS TARGET
DOCKET: MID L -002648 22

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON DENNIS NIEVES

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 003
AT: (732) 645-4300 EXT 88371.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: JAMES M. CURRAN
JAMES M. CURRAN
86 WASHINGTON AVENUE
MILLTOWN NJ 08850

ECOURTS

THE LAW OFFICE OF JAMES M. CURRAN
NEW JERSEY BAR ID REGISTRATION #028631984
86 Washington Avenue
Milltown, New Jersey 08850
(732) 296-0500
Attorney for Plaintiff

SAMANTHA INZINNA,	:	SUPERIOR COURT OF NEW JERSEY
	:	MIDDLESEX COUNTY
Plaintiff,	:	LAW DIVISION
vs.	:	DOCKET NO. MID-L-2648-22
TARGET and/or ABC CORPS.	:	CIVIL ACTION
#1 to #6 (fictitious	:	
names) and/or JOHN DOES	:	SUMMONS
#1 to #6 (fictitious	:	
names),	:	
Defendants.	:	

FROM THE STATE OF NEW JERSEY
TO THE DEFENDANT(S) NAMED ABOVE: **TARGET**
 100 Parsonage Road
 Edison, New Jersey

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A filing fee* payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if not attorney is named above. A telephone

call will not protect your rights; you must file and serve a written answer or motion (with fee and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live. A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Dated: June 7, 2022

Michelle M. Smith
SUPERIOR COURT CLERK

The address for the Deputy Clerk of Middlesex County is:

Superior Court
Attn: Civil Law Division
Middlesex County Court House
56 Paterson Street
P.O. Box 964
New Brunswick, NJ 08903-2633
(732) 645-4300

If you cannot afford to pay an attorney, call a Legal Services Office. An individual not eligible for free legal assistance may obtain a referral to an attorney by calling a county lawyer referral service. These numbers may be listed in the yellow pages of your phone book or may be obtained by calling the New Jersey State Bar Association Lawyer Referral Service toll-free 1-800-792-8315 (within New Jersey) or 609-394-1101 (from out of State). The phone numbers for the county in which this action is pending are: Lawyer Referral Service, 732-828-0053 or Legal Services Office 732-249-7600.

Name of defendant to be served: **TARGET**
Address for service: **100 Parsonage Road, Edison, NJ**

* \$175.00